

Message

From: Keller, Lynn [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=08038B86D66A47D3AACA8BEE1A63A5A7-LKELLER]
Sent: 9/12/2015 12:04:24 AM
To: Ross, Steve@DTSC [Steve.Ross@dtsc.ca.gov]
Subject: RE: Remedial Action Objectives for Area 40

Got it—thanks, Steve. The next piece is CAG agreement, and then we can give you a letter draft so we can work on terms.

Thank you!
Lynn

Lynn M. Keller, EI, PMP
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75 Hawthorne St, SFD 7-1
San Francisco, CA 94105
415-947-4162

From: Ross, Steve@DTSC [mailto:Steve.Ross@dtsc.ca.gov]
Sent: Friday, September 11, 2015 4:34 PM
To: Keller, Lynn
Subject: RE: Remedial Action Objectives for Area 40

Hi Lynn,

Thank you for the detailed information.

DTSC would agree to act as lead oversight for Area 40. It would be under the State program (California H&SC Chapter 6.8), and EPA terms for taking lead would need to be agreeable. Aerojet and its contractors would have to agree to prepare almost all the documents, conduct any necessary response action work, and pay all our oversight costs related to Area 40 activities. The administrative legal mechanism DTSC would use for Area 40 is either a state unilateral order or a consent order for activities up to the O&M stage (O&M under another legal document). CEQA and Public Participation activities come into play as well.

My management is awaiting the EPA terms of transfer (if any), so they can be fully evaluated.

Have a good weekend as well.

Steve.

From: Keller, Lynn [mailto:Keller.Lynn@epa.gov]
Sent: Friday, September 11, 2015 3:29 PM
To: Ross, Steve@DTSC
Subject: RE: Remedial Action Objectives for Area 40

Hi, Steve.

Yes—there have been some developments!

As you know, the next CAG meeting is scheduled for 23 Sept. The plan is to add the transfer of lead oversight for Area 40 from EPA to DTSC to the CAG meeting agenda, so that we can assess how the CAG feels about that possibility. In the

meantime, EPA will be putting a draft letter together from us to DTSC requesting that the State take the oversight lead on Area 40; the draft letter should give us a starting point for this process. Assuming the CAG has no major issue with this way forward, following the CAG meeting EPA will transmit the letter to DTSC with a request for a response letter back. Once we agree on terms, EPA would then create OU10 for Area 40 and we should have a path forward.

Also, we've talked with the City of Folsom and, FYI, it turns out they have another parcel of land in mind (not owned by Aerojet nor is it part of the Superfund listing) that would be suitable for the park/open space area of the new development. The City of Folsom just needs to know at a certain point (not sure when yet) whether Area 40 will be ready/suitable for this purpose; the park/open space requirement needs to be finalized after a certain percent of the new housing is built out (10% possibly—I don't remember offhand). So the urgency in getting Area 40 cleaned up and closed out is more Aerojet's since they have a vested interest in selling it to Folsom; Folsom has another avenue to continue their development plans if needed—and they need to be kept apprised of Area 40 progress and site reuse restrictions as the work continues.

Have you heard any more reactions from your management or the Water Board on the potential transfer of Area 40 to the State?

Have a good weekend, Steve—I'll talk with you next week,
Lynn

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From: Ross, Steve@DTSC [<mailto:Steve.Ross@dtsc.ca.gov>]
Sent: Wednesday, September 09, 2015 1:34 PM
To: Keller, Lynn
Subject: RE: Remedial Action Objectives for Area 40

Hi Lynn,

Any recent developments to share on path forward? Thanks.

Steve

From: Keller, Lynn [<mailto:Keller.Lynn@epa.gov>]
Sent: Tuesday, August 25, 2015 4:31 PM
To: Ross, Steve@DTSC
Subject: RE: Remedial Action Objectives for Area 40

Hi, Steve. Could I discuss the Area 40 site with you tomorrow at some point? Specifically I'd like to talk with you about what would be involved to get DTSC to take over the Area 40 site from the State's point of view. I know Alex volunteered the RWQCB to oversee Area 40, but in talking with Caleb he feels like DTSC would be the more appropriate entity since you have access to the full range of resources that will be needed (risk assessors, toxicologists, etc.). I'm free tomorrow before 10:30 am and after 1 pm if that works for you.

Thanks, Steve!
Lynn

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From: Ross, Steve@DTSC [mailto:Steve.Ross@dtsc.ca.gov]
Sent: Thursday, August 20, 2015 11:23 AM
To: Fennessy, Christopher
Cc: MacDonald, Alex@Waterboards; Keller, Lynn
Subject: RE: Remedial Action Objectives for Area 40

Hi Chris,

Valerie is out for a while so I will run this by her again when she gets back. I wanted to point out something Alex mentioned during our agencies review of the BOU proposed plan. He referenced the ITRC document DNAPL Site Strategy (Nov 2011) for assistance in remedial action objectives and compliance with SMART attributes at http://www.itrcweb.org/GuidanceDocuments/IntegratedDNAPLStrategy_IDSSDoc/IDSS-1.pdf. Thought it was useful in this exercise. I have inserted my revisions without taking into account the SMART suggestions.

Groundwater

1. Reduce the loading of COCs that impair groundwater that prevent groundwater from attaining beneficial uses.
2. Reduce the flux of COCs in groundwater beyond Prairie City Road
3. Prevent the migration of COCs in groundwater at concentrations that pose a threat to human health and the environment north and south into the future planned residential development
4. Prevent modification of groundwater and soil vapor flow conditions, including extraction and recharge except for the purpose of remedial action
5. Mitigate the human health and any significant environmental impacts that may be created by response actions.

Current Land Use

1. Prevent exposure to non-VOCs in soil at concentrations that pose an unacceptable risk to ecological receptors
2. Prevent exposure to VOCs in soil vapor and groundwater at concentrations that pose an unacceptable risk to ecological receptors.

Future Land Use

1. Open Space Area

- a. Prevent exposure to non-VOCs in soil at concentrations that pose an unacceptable risk to ecological receptors.
- b. Reduce exposure to VOCs in soil vapor at concentrations that pose an unacceptable risk to ecological receptors

2. Recreational Area

- a. Prevent exposure to non-VOCs in soil at concentrations that pose an unacceptable risk to future recreational users, recreational workers, and construction worker
- b. Prevent exposure to VOCs in soil vapor and groundwater at concentrations that pose an unacceptable ambient air risk to future recreational users, recreational workers, and construction workers
- c. Prevent exposure to VOCs in soil vapor and groundwater at concentrations that pose an unacceptable indoor air risk to future recreational workers
- d. Prevent exposure to COCs in groundwater at concentrations that pose an unacceptable risk to future construction workers.

3. Mixed use Area (residential and commercial uses)

Prevent exposure to COCs that pose an unacceptable risk to human health

From: Fennessy, Christopher [<mailto:christopher.fennessy@Rocket.com>]

Sent: Thursday, August 20, 2015 7:35 AM

To: Ross, Steve@DTSC; MacDonald, Alex@Waterboards; Keller, Lynn

Subject: RE: Remedial Action Objectives for Area 40

Hi Everyone – We are at the point where we need to finalize the RAOs and proceed with the Area 40 FS. Do you have any comments on the RAOs listed below before we move forward? Thanks, Chris

Christopher M. Fennessy, P.E.

Aerojet Rocketdyne, Inc.

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Email: Christopher.Fennessy@Rocket.com

From: Fennessy, Christopher

Sent: Friday, July 24, 2015 3:38 PM

To: Ross, Steve@DTSC (Steve.Ross@dtsc.ca.gov); MacDonald, Alex@Waterboards

(Alex.MacDonald@waterboards.ca.gov); Keller, Lynn

Subject: Remedial Action Objectives for Area 40

Hi Everyone – I know you are diligently reviewing the Area 40 HHERA...or at the least, it is on your desk in the way of other more important documents (although I can't possibly imagine what those more important documents would be =)). While you are performing your review, we are diligently working on the initial portions of the Area 40 FS. The first step was to develop the draft Remedial Action Objectives. The following is our first cut. Please review and let us know what you think. I have attached a map showing the future use and the anticipated receptors for each area. Thanks! Chris

Groundwater

1. Reduce the loading of COCs to groundwater that prevent groundwater concentrations from attenuating
2. Reduce the flux of COCs in groundwater beyond Prairie City Road
3. Prevent the migration of COCs in groundwater at concentrations that pose a threat to human health and the environment south into the future planned residential development
4. Prevent modification of groundwater flow conditions, including extraction and recharge except for the purpose of remedial action

Current Land Use

1. Prevent exposure to non-VOCs in soil at concentrations that pose an unacceptable risk to ecological receptors
2. Prevent exposure to VOCs in soil vapor and groundwater at concentrations that pose an unacceptable risk to ecological receptors.

Future Land Use

1. Open Space Area
 - a. Prevent exposure to non-VOCs in soil at concentrations that pose an unacceptable risk to ecological receptors.
 - b. Reduce exposure to VOCs in soil vapor at concentrations that pose an unacceptable risk to ecological receptors
2. Recreational Area
 - a. Prevent exposure to non-VOCs in soil at concentrations that pose an unacceptable risk to future recreational users, recreational workers, and construction worker
 - b. Prevent exposure to VOCs in soil vapor and groundwater at concentrations that pose an unacceptable ambient air risk to future recreational users, recreational workers, and construction workers
 - c. Prevent exposure to VOCs in soil vapor and groundwater at concentrations that pose an unacceptable indoor air risk to future recreational workers
 - d. Prevent exposure to COCs in groundwater at concentrations that pose an unacceptable risk to future construction workers.
3. Mixed use Area (residential and commercial uses)
 - a. Prevent exposure to COCs that pose an unacceptable risk to human health

Christopher M. Fennessy, P.E.

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